

Exhibit C

Nelson Mullins

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June 10, 2005

Via Facsimile

Ralph E. Tupper, Esquire
Tupper Grimsley & Dean, P.A.
611 Bay Street
Beaufort, South Carolina 29902

RE: William J. Rauch v. Deutsche Bank Securities, Inc., et al.
Civil Action No. 9:05-cv-00376
Our File No. 20658/01500

Dear Ned:

We are in receipt of Plaintiff's Response to Defendant Deutsche Bank Securities and Richard DeBoe's First Request for Production of Documents and Tangible Things, dated June 8, 2005. In your response to all three requests, you indicated as a basis for your objection that the request sought "information protected by the attorney-client and/or work product privilege and/or information prepared in anticipation of litigation." Rule 26(b)(5) of the Federal Rules of Civil Procedure sets forth that "when a party withholds information otherwise discoverable under [these] rules by proclaiming that is it privileged or subject to protection as trial preparation material, the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privileged or protection." Your response did not contain any such description of the withheld information as required by this rule.

Please amend your discovery response to provide a description of the documents in your possession over which you claim a privilege in accordance with the requirements of Rule 26(b)(5). We would appreciate receiving your amended response no later than Tuesday, June 14, 2005 so that we can avoid motion practice regarding this issue.

Please do not hesitate to contact me with any questions.

Very truly yours,



Brian A. Comer

BAC:kp

cc: John E. Parker, Esquire
Thomas R. Gottshall, Esquire